

**To:** McCoy, Erin[McCoy.Erin@epa.gov]; Mills, Brian (Safety)[brian.mills@titan-intl.com]  
**Cc:** Troyanovich, Mike (Legal)[mike.troyanovich@titan-intl.com]; Pemberton, Scott[Pemberton.Scott@epa.gov]; Hylton Jackson (Hylton.Jackson@dnr.iowa.gov)[Hylton.Jackson@dnr.iowa.gov]; Peterson, Mary[Peterson.Mary@epa.gov]  
**From:** George, Gazi (Environmental)  
**Sent:** Fri 4/22/2016 7:56:14 PM  
**Subject:** RE: Test Results Drums observed during 3/31/16 site visit

Erin

Understood

No problem at all, I am being cautious and in fact I suggested adding the Herbs & Pests to Ms. Johnson.

I want to do things right the first time and thank you for bringing that up.

Have a nice weekend

**From:** McCoy, Erin [mailto:McCoy.Erin@epa.gov]  
**Sent:** Friday, April 22, 2016 3:47 PM  
**To:** Mills, Brian (Safety); George, Gazi (Environmental)  
**Cc:** Troyanovich, Mike (Legal); Albert, Eric (ENRD); Pemberton, Scott; Hylton Jackson (Hylton.Jackson@dnr.iowa.gov); Peterson, Mary  
**Subject:** RE: Test Results Drums observed during 3/31/16 site visit

Gazi, the additional sampling was not per my or EPA's request, but is a requirement for disposal at any contamination site in Iowa per IDNR regulations. I was simply making sure that you were complying with IDNR regulations for disposal. I'm sorry if my e-mail was not clear.

Anyway, it sounds like you have talked to Susan per your e-mail and were updated on IDNR requirements. Thanks!



Erin McCoy, P.G. | Remedial Project Manager

**EPA Region 7** | Superfund Division | Iowa Nebraska Branch

11201 Renner Blvd | Lenexa, KS 66219

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**From:** Mills, Brian (Safety) [<mailto:brian.mills@titan-intl.com>]  
**Sent:** Friday, April 22, 2016 1:49 PM  
**To:** George, Gazi (Environmental) <[gazi.george@titan-intl.com](mailto:gazi.george@titan-intl.com)>  
**Cc:** Troyanovich, Mike (Legal) <[mike.troyanovich@titan-intl.com](mailto:mike.troyanovich@titan-intl.com)>; Albert, Eric (ENRD) <[Eric.Albert@usdoj.gov](mailto:Eric.Albert@usdoj.gov)>; Pemberton, Scott <[Pemberton.Scott@epa.gov](mailto:Pemberton.Scott@epa.gov)>; Hylton Jackson (Hylton.Jackson@dnr.iowa.gov) <[Hylton.Jackson@dnr.iowa.gov](mailto:Hylton.Jackson@dnr.iowa.gov)>; McCoy, Erin <[McCoy.Erin@epa.gov](mailto:McCoy.Erin@epa.gov)>; Peterson, Mary <[Peterson.Mary@epa.gov](mailto:Peterson.Mary@epa.gov)>  
**Subject:** RE: Test Results Drums observed during 3/31/16 site visit

Will do.

**From:** George, Gazi (Environmental)  
**Sent:** Friday, April 22, 2016 1:41 PM  
**To:** Mills, Brian (Safety)  
**Cc:** Troyanovich, Mike (Legal); Mills, Brian (Safety); Albert, Eric (ENRD); Pemberton, Scott; Hylton Jackson ([Hylton.Jackson@dnr.iowa.gov](mailto:Hylton.Jackson@dnr.iowa.gov)); McCoy, Erin; Peterson, Mary  
**Subject:** RE: Test Results Drums observed during 3/31/16 site visit

Please grab another representative sand sample on Monday, send it to Carlee for the following additional testing per Erin's request.

ZHE 10 Volatiles, Semi Volatiles, Pests & Herbs plus total PCB to go through all the RCRA TCLP parameters and PCB.

Do not bring in the dumpster to Dico (roll off) yet.

Please notify Carlee to disregard the first sample because its storage life for ZHE's & Organics has expired.

Let me know when it would be ready.

Thanks

**From:** McCoy, Erin [<mailto:McCoy.Erin@epa.gov>]  
**Sent:** Friday, April 22, 2016 12:30 PM  
**To:** George, Gazi (Environmental); Peterson, Mary  
**Cc:** Troyanovich, Mike (Legal); Mills, Brian (Safety); Albert, Eric (ENRD); Pemberton, Scott; Hylton Jackson ([Hylton.Jackson@dnr.iowa.gov](mailto:Hylton.Jackson@dnr.iowa.gov))  
**Subject:** RE: Test Results Drums observed during 3/31/16 site visit

Gazi, thank you for your quick response on this. Because these drums are from a Superfund site, the sand also needs to be tested for the chemicals of concern related to the site to verify if contamination from the site is present or not before disposal can occur. This assures that the sand is disposed of properly. Please confirm with Sue Johnson at IDNR before disposal to make sure that all of IDNR's regulations are followed. Her number is 515-725-8317. Thanks!



Erin McCoy, P.G. | Remedial Project Manager

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**From:** George, Gazi (Environmental) [mailto:gazi.george@titan-intl.com]  
**Sent:** Thursday, April 21, 2016 2:41 PM  
**To:** McCoy, Erin <McCoy.Erin@epa.gov>; Peterson, Mary <Peterson.Mary@epa.gov>  
**Cc:** Troyanovich, Mike (Legal) <mike.troyanovich@titan-intl.com>; Mills, Brian (Safety) <brian.mills@titan-intl.com>; Albert, Eric (ENRD) <Eric.Albert@usdoj.gov>; Cozad, David <Cozad.David@epa.gov>; Pemberton, Scott <Pemberton.Scott@epa.gov>  
**Subject:** Test Results Drums observed during 3/31/16 site visit

Erin

Attached are the testing results for the “sand drum” found at Dico and addressed in your letter during the 3/31/2016 visit with Mary

Brian Mills sampled the drum under chain of custody (attached).

I requested total metals (specifically Lead) because at one time **there was a foundry on the Dico site.**

The total metals results (under the 20 divider approach) show that the sand is **not a RCRA hazardous waste** for any of the 8 RCRA metals.

If you have any comments please respond ASAP since I am authorizing Brian Mills to get a roll off container on Monday to ship all the empty drums plus the Non-Hazardous sand addressed above to a subtitle D Landfill.

Brian: Please notify Erin of the Roll off arrival and send a copy of the shipper (bill of lading) to her attention

Thank you

**From:** Peterson, Mary [mailto:Peterson.Mary@epa.gov]  
**Sent:** Saturday, April 02, 2016 9:26 AM  
**To:** George, Gazi (Environmental); McCoy, Erin  
**Cc:** Troyanovich, Mike (Legal); Mills, Brian (Safety); Albert, Eric (ENRD); Cozad, David; Pemberton, Scott  
**Subject:** RE: Drums observed during 3/31/16 site visit

Gazi,

Thanks for your prompt reply regarding the drums. I am pleased to hear that you plan to address the drums April 12-13. I am also pleased to learn of your experience in handling dangerous chemicals and providing training to fire departments. Our main concerns are for the safety of onsite workers and the proper disposal of the drummed materials.

Again, thank you for your prompt reply on this important matter.

**Mary P. Peterson, Director**

**Superfund Division**

**EPA Region 7**

**11201 Renner Blvd.**

**Lenexa, KS 66219**

**Office: 913-551-7882**

**Cell: 816-398-3945**



*"To safeguard the health of our communities for all generations,  
we clean up contaminated lands.  
In a culture of teamwork and respect,  
we are efficient, innovative, and fiscally responsible stewards of public trust."*

**From:** George, Gazi (Environmental) [<mailto:gazi.george@titan-intl.com>]

**Sent:** Friday, April 01, 2016 4:27 PM

**To:** McCoy, Erin <[McCoy.Erin@epa.gov](mailto:McCoy.Erin@epa.gov)>

**Cc:** Troyanovich, Mike (Legal) <[mike.troyanovich@titan-intl.com](mailto:mike.troyanovich@titan-intl.com)>; Mills, Brian (Safety) <[brian.mills@titan-intl.com](mailto:brian.mills@titan-intl.com)>; Albert, Eric (ENRD) <[Eric.Albert@usdoj.gov](mailto:Eric.Albert@usdoj.gov)>; Cozad, David <[Cozad.David@epa.gov](mailto:Cozad.David@epa.gov)>; Peterson, Mary <[Peterson.Mary@epa.gov](mailto:Peterson.Mary@epa.gov)>; Pemberton, Scott <[Pemberton.Scott@epa.gov](mailto:Pemberton.Scott@epa.gov)>

**Subject:** Re: Drums observed during 3/31/16 site visit

Erin

Just to add and for your knowledge that I have a PhD in Chemistry since 1976 and train Fire Departments, police and military on dangerous chemicals, chemical warfare and nuclear materials pro bono and has done so for many years the latest being a few weeks ago in Illinois. I appreciate your concern and thank you

But thank you. we will address these during the week of the 12th/13th

Again, thank you

Sent from my iPhone

On Apr 1, 2016, at 4:51 PM, McCoy, Erin <[McCoy.Erin@epa.gov](mailto:McCoy.Erin@epa.gov)> wrote:

Mr. Troyanovich,

During the site visit on March 31, 2016, we observed several drums located inside the building known as the Production Building. Neither Brian Mills nor Gazi George could provide any information about the contents of the drums, where they came from, who put them there, or how long they have been there. Attached are photos showing some of the drums. Most of the drums were blue polyethylene (plastic) material, but one of the drums is a steel drum and is bulging which is indicative of pressure. The bulging drum is of particular concern and must be approached and managed with extreme caution.

All of the drums need to be assessed, characterized, and disposed of immediately. Since the contents of the drums are unknown, the work should be performed by trained and qualified hazardous materials professionals. We strongly suggest using remote technologies, especially for the initial assessment of the bulging drum.

Please reply by 4 pm on April 4, 2016 regarding your willingness and intent to assess, characterize, and dispose of the drums. If a response is not received on or before 4 pm on April 4, 2016, EPA plans to address the drums as an emergency response action.

<image001.gif>Erin McCoy, P.G. | Remedial Project Manager

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<Drums 2.jpg>

<Drums.jpg>

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